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Attorneys for Plaintiff
DONALD LOUNIBOS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DONALD LOUNIBOS, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

KEYPOINT GOVERNMENT
SOLUTIONS, INC., a Delaware
Corporation, and Does 1-10, inclusive,

Defendants.

Case No. 12-CV-0636 (JST)

**STIPULATION AND ~~PROPOSED~~ ORDER
CONTINUING PLAINTIFF'S DEADLINE
TO FILE NEW MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Assigned to Honorable Jon S. Tigar
450 Golden Gate Avenue
San Francisco, CA 94102

STIPULATION

The parties hereby stipulate as follows:

WHEREAS, on July 12, 2013, the Court issued an Order Denying Motion for Preliminary Approval of Class Action Settlement ("Order") (docket number 45). In particular, the Order, stated, "Lounibos' motion for preliminary approval of the proposed settlement is denied without prejudice. Lounibos may file a new motion for preliminary approval of the proposed settlement that cures each of the deficiencies identified in this Order within sixty days of the date this order is filed. A case management conference will be held on October 2, 2013 at 2:00 p.m."

WHEREAS, on October 8, 2013, the Court entered an Order continuing Plaintiff's Deadline to File New Motion for Preliminary Approval of Class Action Settlement. Pursuant to the October 8, 2013, Order, Plaintiff's current deadline to file a new Motion is October 30, 2013.

WHEREAS, the parties have come to agreement on all material terms to a modified settlement that addresses the issues set forth in the Court's Order, including, without limitation, a non-reversionary settlement and a revised class definition. The parties are in the process of memorializing this modified settlement; and

WHEREAS, in order to allow the parties to finalize the settlement and obtain all necessary signatures, the parties request a fifteen (15) day extension of the current deadline in order to finalize the modified settlement agreement and file a new motion for preliminary approval of class action settlement.

IT IS THEREFORE STIPULATED AND AGREED that Plaintiff shall file a new motion for preliminary approval of class action settlement, which addresses the deficiencies set forth in the Court's Order, on or before November 14, 2013. The Case Management Conference, which is currently scheduled to take place on December 4, 2013 at 2:00 P.M., shall be continued until December 18, 2012 at 2:00 P.M., or the next available date this is convenient for the Court.

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1 **IT IS SO STIPULATED.**

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3 Date: October 29, 2013

Respectfully submitted,

NORTH BAY LAW GROUP

4
5 By /s/
 David Harris

6 Attorneys for Plaintiffs
7 DONALD LOUNIBOS

8 Date: October 29, 2013

LITTLER MENDELSON, P.C.

9
10 By /s/
 Michelle Heverly

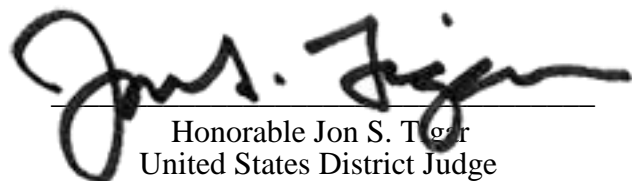
11 Attorneys for Defendants
12 KEYPOINT GOVERNMENT SOLUTIONS, INC.

13 **~~[PROPOSED]~~ ORDER**

14 **IT IS HEREBY ORDERED AS FOLLOWS:**

15 Plaintiff shall file a new motion for preliminary approval of class action settlement on or before
16 November 14, 2013. The Case Management Conference, currently scheduled for December 4, 2013,
17 shall be continued to January 22, 2014, at 2:00 P.M.

18
19 DATED: October 29, 2013

20 
 Honorable Jon S. Tigar
 United States District Judge